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Section: Governance

Policy No: 1.4

Whistle-Blower Policy

PURPOSE: To promote awareness, communicate expectations, and establish a mechanism for reporting issues concerning illegal or unethical conduct by encouraging employees to report possible wrongdoing while protecting reporting employees from retaliation or the fear of retaliation

POLICY: This policy applies to any misconduct involving employees as well as members of the College Heights Foundation Board of Directors, volunteers, consultants, vendors, contractors, outside agencies, and/or any other parties with a business relationship with the College Heights Foundation. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to CHF. All CHF employees and Foundation representatives have a duty to cooperate with investigations initiated under this policy.

Acts of misconduct may include, but are not limited to:

- Misrepresentation of information on documents
- Forgery or alterations of documents
- Theft of Foundation property
- Misuse, misappropriation of funds, supplies, equipment, or other assets
- Falsification of documents
- Violation of local, state, or federal laws
- Authorizing or receiving payment for services not performed

The College Heights Foundation is committed to the highest standards of legal and ethical conduct in its operations. This policy sets forth the protocols for reporting information regarding suspected misconduct. Should any person know of, or have a reasonable suspicion about, illegal or unethical conduct or fraud in connection with the finances or any other aspect of the Foundation's operations, that person is expected to promptly report the conduct orally or in writing as set forth below. Such concerns may involve employees, members of the Board of Directors, consultants, vendors, contractors, or outside agencies. All credible allegations will be investigated in accordance with the CHF and University policies (if applicable).

Reports may be made to any of the following individuals: CHF President, CHF CFO, CHF Board Chair, or CHF Audit and Finance Committee Chair. At all times respecting the privacy and reputation of individuals involved, the College Heights President and the CFO shall be informed, as well as other appropriate members of senior management depending on the substance of the report.

The CHF Secretary will maintain a confidential log of all reports and their disposition. If any material allegation is confirmed, CHF President shall inform the Board Chair and/or the Chair of the Audit and Finance Committee depending on the nature of the allegation. A general report (not identifying any parties) of all complaints, investigations, and actions taken will be made annually to the Audit and Finance Committee in conjunction with their regular reporting. No employee may interfere with the right of an individual to report fraud or misconduct and may not retaliate against another employee who has reported fraud or misconduct. There will be no punishment or other retaliation for the reporting of conduct pursuant to this policy. If the person providing the information requests anonymity, this request will be respected to the extent that doing so does not violate any law or impede any investigation.